

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**RESPONSE BY PLAINTIFFS AND PLAINTIFF-INTERVENORS TO DEFENDANTS’  
ADVISORY REGARDING GUIDANCE FOR THE NOVEMBER 2014 ELECTIONS**

This response to Defendants’ Advisory Regarding Guidance for the November 2014 Elections (ECF No. 629-1) is filed by all plaintiffs and plaintiff-intervenors other than the United States.

Although the state has suggested that the Court’s opinion caused significant confusion, plaintiffs cannot see how the Court’s decision to issue an opinion outlining its legal reasoning in any way *increased* confusion. Far from “adding to the confusion created by the Court’s decision,” Defendants’ Advisory at 2, the Court’s decision to issue its opinion as early as possible has provided all parties clarity. The Court’s opinion clearly explains that the Court will issue an injunction, and plaintiffs have no doubt that the Court will issue this injunction at an appropriate time.<sup>1</sup> This is especially so given that the Court found that SB 14 was enacted with a purpose to discriminate against African Americans and Latinos in Texas. *Cf. City of Richmond v.*

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<sup>1</sup> Plaintiffs would also clarify that all forms of SB 14-compliant photo ID would have been accepted as sufficient proof of voter identity under the voter identification rules in effect prior to passage of SB 14, so no voters thinking they have to comply with SB 14 would be turned away if the Court ordered Texas to return to its old rules for this upcoming election. *See* PL471 §30 (allowing the use of, among other things, any “form of identification containing the person’s photograph that establishes the person’s identity”). To the extent that the Court believes it helpful to make this proviso explicit, plaintiffs would have no opposition to that.

*United States*, 422 U.S. 358, 378 (1975) (“An official action . . . taken for the purpose of discriminating against Negroes on account of their race has no legitimacy at all under our Constitution or under the [Voting Rights Act].”).

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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